

RUBINSTEIN & COROZZO, LLP
COUNSELORS AT LAW

RONALD RUBINSTEIN
JOSEPH R. COROZZO

BRIANA L. HERMAN

260 MADISON AVENUE
22ND FLOOR
NEW YORK, N.Y. 10016

TELEPHONE (212) 545-8777
FAX (212) 679-1844

April 2, 2008

Via Facsimile (212 – 805 – 7917) and ECF

Honorable Robert P. Patterson
United States District Judge
500 Pearl St., Room 2550
New York, NY 10007

RE: *United States v. Daniel Karron*, 07-cr-00541

Dear Honorable Judge Patterson:

A contract for an all cash sale of Dr. Karron's apartment for \$515,000.00. was agreed upon. To assure the closing is held prior to the start of trial on June 2, 2008, the Buyer has requested before signing that \$10,500.00. be held in Escrow by Seller's real estate attorney Martin Semel. This money represents \$3,500.00. per month for up to three months to allow Dr. Karron to vacate the premises. Should Dr. Karron vacate prior to the end of the three month period, the remaining monies will be transferred directly to the U.S. Marshals per the original stipulation and order and held pending further order from this Court.

Defense counsel spoke with the government regarding this understanding. The government takes no position on this proposal with the understanding that no extension of time will be granted to Dr. Karron to vacate the premises and thus, the amount in escrow will in no event exceed \$10,500.00.

In light of the aforementioned proposal, defense counsel respectfully requests approval to modify and incorporate the following language at page 4, paragraph 6 (i) into the original stipulation and order dated November 27, 2007, attached hereto as Exhibit A, to read as follows:

6. The net proceeds shall include all monies realized from the sale of the Condominium, except the following:

- i. *\$10,500.00. held in escrow by Seller's attorney Martin Semel reflecting the understanding between Buyer and Seller that Seller is permitted to remain at the sold premises for up to three months after the closing date, and should Seller vacate the premises before the end of the three month period, the money remaining shall be forwarded to the U.S. Marshal's service pending further order of the Court.*

Respectfully submitted,



Ronald Rubinstein

cc: AUSA Steven Kwok via ECF